

Mr. William R. Hutchison, P.G.  
El Paso Water Utilities  
1154 Hawkins Blvd.  
El Paso, Texas 79961

Re: Authorization and Registration of Class V Injection Wells  
TCEQ Authorization No. 5X2700062, WWC10918724, CN602812521  
Joint Desalinization Facility

Dear Mr. Hutchison:

The Underground Injection Control (UIC) staff has completed its review of the injection well application submitted by LBG-Guyton Associates dated March 8, 2005 and amendments dated May 12, 2005 and June 20, 2005 addressing the use of five Class V injection wells to inject discharge water from a desalinization plant used to convert brackish groundwater to potable water. Based on this review, authorization by rule is hereby given for the construction and operation of the Class V injection wells for this site contingent upon the operator's compliance with the applicable provisions of 30 TAC Chapter 331, the plans and specifications in the application and its amendments, and the following conditions:

1. After completion of well construction and prior to initiation of injection operations, a well completion report shall be submitted to and approved by the UIC staff at Mail Code MC-130. This report shall include as built drawings and material specifications properly sealed by a licensed engineer, a log of daily activities in construction and testing of the well, copies of all well logs, core analysis, formation water sample analysis, pressure test data for casings and the injection zone, the results of mechanical integrity testing of the well, and the latitude and longitude of the well.
2. The initial formation water analysis shall determine background water quality for reference in future monthly sampling of injected wastewater, and shall include those constituents listed in 30 TAC §§290.104(b), 290.105, and 290.108 and also gross beta and lead.
3. After construction and prior to startup of the disposal wells, the injected waste stream shall be sampled at the point of injection and analyzed for the same chemical and physical parameters specified in Condition 2 above. The sampling and analysis shall be repeated monthly and submitted quarterly to the commission's UIC staff at Mail Code MC-130. The injected waste stream shall not exceed any national or state primary drinking water standards.
4. If the concentrations of individual chemical parameters of the injectate at any time exceed the limits specified in the above Condition 3, the operator shall notify the UIC staff and cease injection until the concentration is brought back into compliance with the requirements of Condition 3.

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5. The operating surface injection pressure shall not exceed 0.0 psig and the maximum instantaneous rate of injection shall not exceed 1,100 gpm for any individual well. The average rate of injection shall not exceed 2,100 gpm for all wells combined. Maximum monthly and yearly injection volume for all wells combined shall not exceed 93,744,000 and 1,103,760,000 gallons respectively.
6. Continuous monitoring and digital recording of injection pressure, injection rate, and injection volume shall be conducted and reported quarterly to the UIC staff at Mail Code MC-130.
7. Mechanical integrity shall be demonstrated on an annual basis determined by the anniversary date of the original mechanical integrity testing on the well. The annual testing of the well shall also include a pressure falloff test, with measurement of static bottom hole pressure and fluid level.
8. Closure (plugging) of the injection well shall comply with standards provided in 30 TAC §331.133. Closure reports including details of work performed, any test data collected, and a summary of the well history and injected volume shall be submitted to the UIC staff at Mail Code MC-130 within 60 days of completion of injection.
9. Any spills and releases during well construction, workover, maintenance treatments, testing, waste disposal or closure shall be collected and managed in an appropriate manner according to Commission rules.
10. Changes in well design, construction, operation, location, or status shall be reported to and approved by the UIC staff at Mail Code MC-130.

If you have any questions about this matter, please contact me at (512) 239-6075. If you will be corresponding by mail, please use mail code (MC-130).

Sincerely,

Bryan Smith, Project Manager  
UIC Permits Team  
Industrial and Hazardous Waste Permits Section  
Texas Commission on Environmental Quality

BSS/ff

cc: Mr. John Ashworth, LBG-Guyton Associates, Austin  
Mr. Brad Cross, LBG-Guyton Associates, Austin

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